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ILLINOIS COMMERCE COMMISSION

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STATE OF ILLINOIS

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ILLINOIS COMMERCE COMMISSION

| | | OBJEE GLERK'S OFFICE |
|---------------------------------------|---|----------------------|
| MT. CARMEL PUBLIC UTILITY CO. |) | |
| |) | |
| Petition for approval of Residential |) | Docket No. 01-0525 |
| Delivery Services Implementation Plan |) | |
| under 220 ILCS 5/16-105. |) | |

VERIFIED PETITION TO INTERVENE OF MIDAMERICAN ENERGY COMPANY

NOW COMES, MidAmerican Energy Company ("MidAmerican") and, pursuant to 83 Illinois Administrative Code Section 200.200, petitions the Illinois Commerce Commission ("Commission") for leave to intervene in the above-captioned proceeding and, in support of this petition, states as follows:

- 1. MidAmerican is an Iowa corporation having an office at 106 East Second Street, Davenport, Iowa 52801. MidAmerican is engaged in the business of generating, transmitting and distributing electric energy, and distributing and transporting natural gas in portions of the State of Illinois and elsewhere and is a public utility within the meaning of the Illinois Public Utilities Act (Act), 220 ILCS 5/1-101, et seq.
- 2. On August 1, 2001, Mt. Carmel Public Utility Co. ("Mt. Carmel") filed a petition for approval of its Residential Delivery Services Implementation Plan.
- 3. As an Illinois public utility engaged in the business of generating, transmitting, and distributing electric energy in Illinois, MidAmerican has a direct and substantial interest in the subject matter of this proceeding. MidAmerican is also one of

the electric utilities that has filed tariffs to implement delivery services for residential customers later this year, including a request for approval of its own residential delivery services implementation plan. MidAmerican is also actively participating in the Illinois market as an alternative electric supplier. Decisions made in the instant proceeding could affect MidAmerican's interests as an electric utility and as an alternative electric supplier.

- 4. No other party to this proceeding can adequately represent MidAmerican's interests.
- 5. The granting of MidAmerican's Petition to Intervene will not delay this proceeding.
- 6. MidAmerican requests the following persons be placed on the official Service List in this proceeding:

Robert P. Jared
Karen M. Huizenga
Attorneys
MidAmerican Energy Company
106 East Second Street
P. O. Box 4350
Davenport, Iowa 52808
rpjared@midamerican.com
kmhuizenga@midamerican.com

MidAmerican agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice.

WHEREFORE, MidAmerican Energy Company respectfully requests leave to intervene and to participate as a party in this proceeding.

Dated at Davenport, Iowa this 20th day of August, 2001.

Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

One of its attorney

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kmhuizenga@midamerican.com

| STATE OF IOWA |) | |
|-----------------|---|-----|
| |) | SS. |
| COUNTY OF SCOTT |) | |

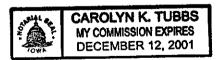
VERIFICATION

Robert P. Jared, being first duly sworn, deposes and says that he is an attorney for MidAmerican Energy Company; that he has read the foregoing Petition of MidAmerican Energy Company for Leave to Intervene and knows the contents thereof; and that the statements therein contained are true to the best of his knowledge, information and belief.

Robert P. Jared

Subscribed and sworn to before me this 20th day of August, 2001.

Notary Public



CERTIFICATE OF SERVICE

I hereby certify that I have on this 20th day of August, 2001, served the foregoing document upon the attached Service List by U. S. Mail in accordance with the rules of the Illinois Commerce Commission.

Robert P. Jared

Eric Bramlet kblaw@midwest.net

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